

RCRA PERMIT
FOR THE
IDAHO NATIONAL LABORATORY

Volume 14
INTEC Liquid Waste Management System

Attachment 9
Permit Modification Tracking Log

Revision Date: April 12, 2011

PERMIT MODIFICATION TRACKING LOG

SUBMITTED	APPROVED	PMR CLASS	SUMMARY OF CHANGES
December 2004	Not Applicable	1	<ul style="list-style-type: none"> - Entire permit reformatted and repaginated including 9 new permit appendices - other informational changes including: <ul style="list-style-type: none"> • Permit requirements II.K.6.a, II.M.8. and II.Q.1.d. have been fulfilled. No further action is required so text has been removed. • Permit requirements II.Q.1.c, III.E.3., and V.E.2.d. have been revised based on clarification received from DEQ • security information revised (Attachment 3, Section F-1) • revised inspection forms (Attachment 4, Section F-2, Appendices F-1 through F-6) • revised preparedness information concerning fire water pumps (Attachment 6, Section F-3) • revised contingency plan information (Attachment 7, Section G-4 Notification, Tables G-1, G-2, G-4 and G-5 Emergency Response Equipment, Exhibits G-1 through G-10 Evacuation Routes) • corrected IDAPA citations found in Attachment 8 • addition of permit modification log • updated Section D drawings – Appendix III
April 19, 2005	April 26, 2005	1*	Transfer of operational control from Bechtel BWXT Idaho, LLC. to CH2M-WG Idaho, LLC. – Effective Date: May 1, 2005

SUBMITTED	APPROVED	PMR CLASS	SUMMARY OF CHANGES
March 2005	December 21, 2005	3	<p>Informational changes including:</p> <ul style="list-style-type: none"> • Revise the permit to allow for evaporation (X99) of liquid waste in the ETS • Revise the permit to allow for the storage (S02) of liquid waste in tanks • Revise the permit to allow for the treatment (T01) of liquid waste in tanks • Remove the compliance schedule conditions that have been completed • Provide other administrative and informational changes • Clarify the requirements for emissions sampling and evaluation of the risk analysis • Correction of typographical errors • Change the name of the INEEL to the INL • Update the Part A Permit Application
August 21, 2006	Not Applicable	3	<ul style="list-style-type: none"> - Add the Integrated Waste Treatment Unit to the INTEC Liquid Waste Management System - Information changes, including: <ul style="list-style-type: none"> • revise the permit to allow for steam reforming of liquid waste (X99) in the IWTU • revise the permit to allow for new/additional storage of waste in tanks (S02) • revise the permit to allow for new/additional storage of waste treatment product in containers (S01) • revise the permit to allow for the treatment of waste in tanks (T01) • provide other administrative and informational changes • correction of typographical errors • update the Part A Permit Application

SUBMITTED	APPROVED	PMR CLASS	SUMMARY OF CHANGES
September 25, 2006	October 3, 2006	1*	<p>Changes made include the following:</p> <ul style="list-style-type: none"> • Revision of the waste minimization certification submittal date from July 1 to March 1 of each year in Permit Condition II.J.2. • Deletion of Compliance Schedule items that have been completed in Permit Condition II.P. • Submission of Independent Professional Engineer Certification for the embedded line upgrades • Submission of a implementation plan for administrative controls for penetration 20015Y • Deletion of information found in Attachment 1, Section D-2f(1)(b) that discusses compliance schedule items that have been completed • Revision of Permit Condition III.P. table to reflect administrative control for tanks VES-WM-100 and VES-WM-101 • Updated the Permit List of Appendices - Appendix III Diagram List to reflect all diagrams found in Appendix III
December 7, 2006	March 27, 2007	3	Response to a Notice of Deficiency. Same Summary of Changes listed for August 21, 2006 submittal above.
August 29, 2007	September 13, 2007	1*	<p>Changes made include the following:</p> <ul style="list-style-type: none"> • Updated Permit Condition II.P.2. interim compliance schedule for closure of the CPP-641 West-Side Hold Up Tanks • Clarified Permit Condition I.U. semi-annual noncompliance reporting due date • Revised Attachments 6 and 7 regarding the use of emergency communication devised • Revised Attachment 7 list of Emergency Action Managers • Corrected typographic errors found in Attachment 1, Table D-7

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December 18, 2007	December 28, 2007	1*	<p>Changes made include the following:</p> <ul style="list-style-type: none"> Updated Permit List of Attachments, Permit Conditions II.K.1., II.K.6., II.K.7., IV.C.7., and VI.G. to include Attachment 8A (CPP-641 Westside Waste Holdup Tank System Closure Plan) Added Attachment 8A – Closure Plan for the CPP-641 Westside Waste Holdup Tank System.
May 2008	August 6, 2008	1*	<ul style="list-style-type: none"> Revise interim compliance dates for Permit Condition II.P.3.a. and II.P.4.a. Provide clarification regarding the use of emergency communication devices in Attachments 3, 4, and 7. Provide clarification regarding inspection requirements/remedial actions in Attachment 4. Update the list of agencies having Memoranda of Understanding (MOUs) and Memoranda of Agreement (MOAs) with the DOE-ID in Attachment 7. Update the list of Emergency Action Managers found in Attachment 7. Correct typographical errors found in the header of the Permit – Table of Contents through Module VII, and Attachments 1 and 4.
July 31, 2008	October 29, 2008	2	<p>Add and update information for design changes to the IWTU.</p> <ul style="list-style-type: none"> Design changes (volumes, materials of construction, and deletion of equipment). Provide clarification regarding inspection requirements. Correct typographical errors found in the Permit.

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January 2009	March 24, 2009	3	<p>Changes made include the following:</p> <ul style="list-style-type: none"> • Revision of the List of Attachments, Permit Conditions II.K.1., II.K.6., II.K.7., IV.C.7., and VI.G. to reflect the addition of Attachment 8B to the Permit. • Addition of Attachment 8B to the Permit. Attachment 8B is the unit-specific closure plan for the CPP-601 Deep Tanks System. • Revision of Attachment 5, Appendix F-5 and Appendix F-8 to remove VES-WLL-195 from the list of daily visual inspection when the fractionators are not operating.
October 19, 2009	October 22, 2009	1*	<p>Changes include the following:</p> <ul style="list-style-type: none"> • Revision of the List of Attachments, Permit Conditions II.K.1., II.K.6., II.K.7., IV.C.7., and VI.G. to reflect the addition of Attachment 8C to the Permit. • Addition of Attachment 8C to the Permit. Attachment 8C is the unit-specific closure plan for the CPP-602 Laboratory Lines.
September 2010	September 30, 2010	1*	<ul style="list-style-type: none"> • Addition of the HWMA/RCRA Closure Plan for the CPP-601/627/640 Landfill Phase 2, September 2010 (Revision 2) to Attachment 8B of the Permit.

SUBMITTED	APPROVED	PMR CLASS	SUMMARY OF CHANGES
March 17, 2011	April 12, 2011	1*	<ul style="list-style-type: none"> • Delete Permit Conditions that are no longer applicable: II.P.4., II.E.6., II.P.2., IV.A., and revise Permit Conditions II.J.2. and II.C.3 to reflect revised conditions • Remove information pertaining to the CPP-641 Westside Waste Holdup Tanks (VES-WL-103, VES-WL-104, and VES-WL-105) and the CPP-601 Deep Tanks (VES-WG-100, VES-WG-101, VES-WH-100, VES-WH-101) • Remove all information pertaining to the closure of the CPP-602 Laboratory Lines • Revise the Part A Permit Application to use the revised/updated EPA forms and delete information pertaining to units that have been closed. • Non-IWTU related administrative, informational and editorial changes • IWTU Construction/Operations Changes/Updates to the Permit • IWTU Equivalent Superior Changes (Waste Feed Tank, VES-SRC-131, Sump dimensions) • IWTU Administrative/Informational Changes